REMARKS

By this Amendment, claims 1 and 4. have been amended Therefore, claim 1, 3 and 4 are pending. Support for the instant amendments is provided throughout the as-filed specification. Thus, no new matter has been added. In view of the foregoing amendments and following comments, allowance of all the claims pending in the application is respectfully requested.

REJECTIONS UNDER 35 U.S.C. §103

Claims 1, 3 and 4 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,870,698 to Riedel *et al.* ("Riedel") in view of U.S. Patent Application Publication No. 2003/0176938 to Tuszynski ("Tuszynski"). Claims 1, 3 and 4 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,461,570 to Wang *et al.* ("Wang") in view of Tuszynski. Applicants respectfully traverse these rejections for at least the following reasons.

Applicants disagree with the propriety of the rejections. However, solely in an effort to expedite prosecution, claims 1 and 4 have been amended to clarify points of patentability over the art cited. With this said, claim 1 is directed to a stand-alone display device of an injection molding machine that operates in accordance with an operating condition and recites, *inter alia*, an input unit configured to receive an input including a state of an operating quality for a change in the operating condition; a storage process unit configured to store data including history data including one or more of product data, mold numbers, resin material data or product molding conditions, the history data indicative of the change in the operating condition and the state of the operating quality corresponding to the change, wherein the storage process unit configured to record data including data indicative of product identification data indicating a product produced by the injection molding machine in accordance with the change in the operating condition and the history data corresponding to the product identification data; and a display unit configured to display data including the history data and the state of the operating quality resulting from the change in the inputted operating condition in claim 1. The cited portions of Riedel, Wang, Tuszynski, and any proper combination thereof, fails to disclose, teach or render obvious every feature in claim 1.

Moreover, claim 4 has been amended and is directed to a stand-alone history collecting system and recites, *inter alia*, a communication unit configured to communicate with a display device of an injection molding machine operated in accordance with an operating condition through a communication medium; a unit configured to receive data including history data including one or more of product data, mold numbers, resin material data or product molding conditions, the history data indicative of a change in the operating condition and a state of an operating quality corresponding to the change in the operating condition from the display device using the communication unit; and a storage unit configured to store the history data, wherein the storage unit records data indicative of a product identification data indicating a product produced by the injection molding machine in accordance with the change in the operating condition and the history data corresponding to the product identification data, wherein the display unit is configured to display data including the history data and the state of the operating quality resulting from the change in the operating condition in claim 4. The cited portions of Riedel, Wang, Tuszynski, and any proper combination thereof, fails to disclose, teach or render obvious every feature in claim 4.

In contrast, Riedel discloses a monitoring apparatus that is externally attachable to machines such as a injection molding machine. *See*, column 1, lines 7-14 of Riedel. The Office Action concedes that Riedel fail to disclose that "the storage process unit records data indicative of product identification data indicating a product produced by the injection molding machine, in accordance with the change in the operating condition and the history data corresponding to the product identification data." [Office Action, page 3].

In addition, Applicants submit that the cited portions of Riedel also fails to disclose or teach the features of an input unit configured to receive an input including a state of an operating quality for a change in the operating condition, as recited in claim 1. The Office Action alleges that Riedel, as illustrated in item 24 of Figure 1, discloses this feature. In fact, this illustration is simply labeled as "2x24 Liquid Crystal Display" and its related description at column 5, lines 31-34 merely states that the display 24 is enabled to communicate between a user/operator and the metering/monitoring apparatus 24. There is nothing within the cited portions of Riedel or its related description to disclose or teach that the display 24 is

configured to receive an input of a state of an operating quality for a change in the operating condition, as recited in claim 1.

Wang discloses a quality control system for a contact lens manufacturing facility that automatically acquires process control data from a plurality of manufacturing process controllers that control contact lens production and that can automatically process the data for real-time display and off-line analysis purposes. *See*, column 1, line 64 – column 2, lines 2 of Wang. In fact, the cited portions of Wang specifically disclose a plurality of operator stations 400 including display server 404 and user interface manager 502 which are connected by a network 99 to an offline analysis node 500, a data acquisition node 100. *See*, Figure 1 of Wang.

Thus, the cited portions of Wang clearly disclose a plurality of display devices, whereas, the invention as claimed recites a stand-alone display device. In other words, Wang is incapable of disclosing or suggesting the use of a single display device of an injection molding machine that operates in accordance with an operating condition, much less teach a storage process unit configured to store data including history data including one or more of product data, mold numbers, resin material data or product molding conditions, the history data indicative of the change in the operating condition and the state of the operating quality corresponding to the change, wherein the storage process unit configured to record data including data indicative of product identification data indicating a product produced by the injection molding machine in accordance with the change in the operating condition and the history data corresponding to the product identification data; and a display unit configured to display data including the history data and the state of the operating quality resulting from the change in the inputted operating condition, as recited in claim 1, and similarly recited in claim 4.

The cited portions of Tuszynski fail to remedy the above-described deficiencies of either Riedel or Wang. The cited portions of Tuszynski merely teach a statistical modeling approach to determine the relationship of various input parameters with a resulting output product. *See*, paragraphs [0013] and [0014] of Tuszynski. The cited portions of Tuszynski do not disclose, teach or render obvious at least the features of a storage process unit configured to store data including history data including one or more of product data, mold

numbers, resin material data or product molding conditions, the history data indicative of the change in the operating condition and the state of the operating quality corresponding to the change, wherein the storage process unit configured to record data including data indicative of product identification data indicating a product produced by the injection molding machine in accordance with the change in the operating condition and the history data corresponding to the product identification data; and a display unit configured to display data including the history data and the state of the operating quality resulting from the change in the inputted operating condition, as recited in claim 1 and similarly recited in claim 4.

Therefore, the cited portions of Riedel, Wang, Tuszynski, and any proper combination thereof, fails to disclose, teach or render obvious every feature in claims 1 and 4. Claim 3 is patentable over the cited portions of Riedel, Wang, Tuszynski, and any proper combination thereof, at least by virtue of its dependency from claim 1, and for the additional features it recites.

Thus, Applicants respectfully request that the rejections under 35 U.S.C. §103(a) be withdrawn and the claims be allowed.

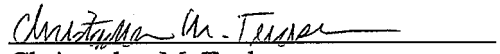
CONCLUSION

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Date: March 20, 2008

Respectfully submitted,

By: 

Christopher M. Tucker
Registration No. 48,783

PILLSBURY WINTHROP SHAW PITTMAN LLP
P.O. Box 10500
McLean, Virginia 22102
Direct Dial: 703-770-7646
Main: 703-770-7900
Fax: 703-770-7901